

PROPOSED SNOWY 2.0 DEVELOPMENT IN KOSCIUSZKO NATIONAL PARK

A submission to the Environmental Impact Statement

Prepared by Associate Professor Graeme L. Worboys,

Fenner School of Environment and Society,

Australian National University,

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Email: g.worboys@bigpond.com

This submission is based on an initial review of the EIS.

SUBMISSION KEY POINTS

1. Support for a cleaner atmosphere

I support initiatives that generate energy for Australia and that do not enhance carbon dioxide pollution of the atmosphere and climate change.

2. Support for the concept of pumped hydro-schemes

I support in principal the concept of pumped hydro-schemes.

3. No support for the current Snowy 2.0 Scheme

I do not support the current Snowy 2.0 Scheme design given:

- The transformation and permanent modification of *too large* a part of Kosciuszko National Park that was otherwise actively managed for its natural values;
- An apparent lack of commitment to the status and management objectives of the “Back Country” Zoning of Kosciuszko National Park (KNP) as identified in a statutory instrument, the 2006 KNP plan of management;
- An apparent lack of respect for National Heritage Listed KNP catchment lands that should be returned to their natural condition post disturbance; and
- An apparent lack of commitment to sharing and contributing to the on-going, post development management of the catchments. How could Snowy 2’s operation assist the on-going well-being of the mountain catchments of KNP?

The EIS and the proposal could be improved a great deal to be acceptable as a guiding statement for how the natural values of Kosciuszko National Park will be protected during construction and restored post Snowy 2.0 development. Only then could it be considered for potential support. I have provided further notes hereunder in relation to my non-support.

4. “Too large an impact”

Snowy 2 has created a tension: It is “Critical State Significant Infrastructure (CSSI) values” for energy *versus* “nationally significant Natural Heritage values”.

The EIS provides no effective response to this clash of values: sustainable energy versus National Heritage. It is not OK to just go out an engineer a National Heritage property. The disturbance footprint is cited to be “just” 0.25% of KNP.

The reality is very different:

- The 673,542 Ha KNP is not a single uniform environment type.
- KNP is zoned to identify its different spatial area values and how these are to be managed.
- Most of the Snowy 2 area is in the special “Back Country Zone” that is managed for its essentially natural condition (2006 KNP plan of management).
- This Back Country Zone includes three previously published (1982 POM) “Management Units” that will be impacted by the Snowy 2 developments including the:
 - Murrumbidgee Management Unit: Managed for its natural values (Sub-alpine plateau)
 - Yarrangobilly Management Unit: Managed for its Outstanding Natural Resources (Limestone and montane forests)
 - Tumut Management Unit: Managed for its natural values (Montane Forests of the Deep Northern Valleys)

These unique *Natural Heritage* listed Management Units will have a much greater proportion of area impacted than 0.25%. The current design and associated enhanced road systems and new power lines has too large an impact, and the impacts would change these management units forever. It is a loss of substantial natural National Heritage listed lands that is unacceptable.

6. Lack of commitment to the KNP plan of management

Snowy 2 extends the current Snowy Scheme engineering works. The so-called 0.25% of KNP is not an isolated development; it is part of a larger complex of Snowy developments. The spatial area of KNP already impacted by the Snowy Scheme and associated power lines is substantial comprising areas occupied by seven power stations, 16 major dams, 145 kilometres of interconnected tunnels, 80 Kilometres of aqueducts and major transmission lines through the park. The challenge for KNP’s management has been to retain the remaining natural areas in a natural condition. These are precious remnants as identified by the three Management Units. Restoration is another key action. The KNP 2006 POM provides leadership for both of these objectives. Snowy 2 is intruding into an important Zoned “natural area” and consequently is in direct conflict with the management objectives of this area. The EIS appeared to be silent about KNP’s management objectives, thus increasing the difficulty of dealing with the “Snowy 2 versus National Heritage” tension in the planning.

7. Restoration

The EIS foreshadows restoration, but there is an absence of a commitment to returning the landscape to how it was. There is no driving objective by the EIS to return the park to its

previous state. Tracks will become roads, but there is no commitment to returning them to low key tracks. Dams will receive infill and are suggested as visitor amenity sites rather than respecting the POM planning direction of retaining a natural amenity for that area.

8. A new development ethic

The Snowy Mountains Scheme was a highly successful engineering construction; however it was more about taming nature than working with it. The status of the Kosciuszko State Park as a protected area and the Trust's role were barely considered in the 1949 to 1974 Snowy operation. There was often considerable tension when it came to protect the park's heritage values. Engineers were on a mission to transfer every drop of water in the mountains westwards, with power being generated on the way. They had money, equipment and people to transform the park. The Scheme was achieved, but there was a price to pay with impacts to Kosciuszko's nature. Since 1974, the NPWS has been cleaning up after the Snowy Scheme every year including weed control, willow removal, pest animal control, garbage dump clean ups, old construction camp site clean ups, quarry sites and tunnel rock dumps.

In 2019, it appears as though the management objectives of KNP were not considered in the EIS. If this is correct, it has to be better than this.

In the 21st Century, it is critical that any Snowy 2.0 construction operation works with nature (and the NPWS), not against it. Governance arrangements and contractual specifications need to account for the park hosts, the NPWS including roles they must have such as an embedded liaison officer, with real power to ensure the park is protected from non-design excesses. This must be part of the cost of the construction. Construction progress must also include environmental protection milestones with Construction Managers accountable for this performance. Engineers are supervising a development in a National Heritage listed property and their work has to be respectful and of the highest standard.

9. Protecting the park

The proposed 2000 construction workers are in effect guests within KNP for the duration of any construction period. KNP will need to be protected from any illegal activities. Unfortunately, history has shown that protected areas affected by construction developments can be impacted by off-duty construction workers. Vigilance by NPWS staff employed to protect the park will be essential. Induction programs will also be essential for all contractor employees, both professional and construction staff.

10. Quarantine provisions

Kosciuszko is still treating annually weed species introduced by the Snowy Scheme as long ago as the 1950's and 1960's. Quarantine provisions and cleansing requirements for contractor staff and equipment accessing the park and the construction site will be essential

to help protect the park. Introduced plants (flowers) and domestic cats (pets) were introduced to the park by Snowy employees and many either escaped or were released and are still creating problems in 2019. It has to be better than this.

11. An investment by Snowy 2.0

Snowy 2.0 is an opportunity for the nation to invest back into KNP's catchments. These catchments have delivered for the Snowy and the nation for 70 years and it is time for a payback in the form of much needed restoration and maintenance.

The park's catchments need a permanent investment contribution for such restoration that could include part of an annual Snowy 2 dividend. Action is needed to repair the headwater catchments of the Snowy, Murray and Murrumbidgee and their associated wetlands, including maintenance work on the restoration completed between 1957 and 1983 in the Mt Carruthers area. Such work has been described in the 2011 *Caring for Our Australian Alps Catchments Report* (Worboys et al, 2011). Further work is now needed due to excessive numbers of feral horses in the mountain catchments. This investment could (for example) be a formalised involvement of the Snowy Hydro Board of Directors in helping to protect their assets and their availability of water as well as contributing to the protection of a National Heritage icon.



Dr Graeme L. Worboys

Reference:

Worboys, G.L., Good, R.B. and Spate, A.P. (2011) *Caring for Our Australian Alps Catchments*, Technical Report to the Australian Alps Liaison Committee, Canberra